

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CASE NO. 1:20CV66

CARYN DEVINS STRICKLAND, )  
                                )  
Plaintiff,                 )  
                                )  
vs.                         )  
                                )  
UNITED STATES OF AMERICA, et al., )  
                                )  
Defendants.                 )

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DEPOSITION  
OF  
**GARY ROBERT ALBRECHT, PhD**

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Winston-Salem, North Carolina  
July 17, 2023  
8:59 p.m.

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1 Q. Okay. And then what is---

2 A. And this one (indicating).

3 Q. What is the one underneath it?

4 A. This one (indicating)?

5 Q. This one right here (indicating). Sorry.

6 A. This one (indicating)?

7 Q. Yeah.

8 A. That's my notes with Ms. Strickland. You  
9 should have that. Yeah, you do.

10 Q. We do have that one. Okay. Great.

11 MR. STRICKLAND: I think just to clarify  
12 what they're -- what they're telling you is  
13 you have a duty to continue to update your  
14 production.

15 THE WITNESS: Oh.

16 MR. STRICKLAND: So if you created  
17 something yesterday---

18 THE WITNESS: Yeah, and this, I  
19 created and this, I created yesterday.

20 MR. STRICKLAND: ---pursuant to their  
21 subpoena, you're going to have to provide  
22 them.

23 THE WITNESS: Sure. No problem.

24 Q. All right. So just going over your report  
25 one last time because I just want to be clear, in your

1 original report, you said the present value of the  
2 difference in expected earnings is 2,949,962. That  
3 number is not correct, is that right?

4 A. 2,949,962 is not correct. It is 2,906,243.

5 Q. And is the original tax liability you  
6 calculated of \$470,648 also incorrect?

7 A. Yes.

8 Q. And is the original make whole amount you  
9 calculated of \$3,420,610 also incorrect?

10 A. Yes. It is 3,373,039.

11 Q. Are the tables in your original report also  
12 incorrect?

13 A. Some of them, yes.

14 Q. Which tables---

15 A. Well, I guess they're all incorrect, yeah.

16 Q. So all the tables 1 through 9 are all  
17 incorrect?

18 A. Yes.

19 MS. YOUNG: So we object to the fact  
20 that the numbers that we were provided are  
21 wrong and that the new numbers and new tables  
22 that you did were not produced prior to the  
23 deposition and were not used in the report  
24 and weren't produced in advance under the  
25 Rule 45 subpoena. And I think that's all we